

1 THE HONORABLE BARBARA JACOBS ROTHSTEIN
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 TATIANA WESTBROOK, an individual;
12 JAMES WESTBROOK, an individual; HALO
13 BEAUTY PARTNERS, LLC, a Nevada Limited
14 Liability Company,

Plaintiffs,

v.

KATIE JOY PAULSON, an individual;
WITHOUT A CRYSTAL BALL, LLC, a
Minnesota Limited Liability Company; and
DOES 1 through 100, inclusive,

Defendants.

15 NO. 2:20-cv-01606-BJR

16 **DECLARATION OF HOPE WALKER
17 IN SUPPORT OF PLAINTIFFS'
18 OPPOSITION TO DEFENDANTS'
19 MOTION TO DISMISS**

20 I, HOPE WALKER, hereby state as follows:

21 1. I am over the age of eighteen and am competent to testify to the facts alleged
herein.

22 2. I am a resident of the State of Washington, and I live in the city of Bothell. I have
been a resident of the State of Washington my entire life.

1 3. I was a supporter of Tatiana “Tati” Westbrook (“Tati”) from approximately 2017
2 through May 2019. Specifically, I would watch on a regular basis Tati’s monetized YouTube
3 beauty guru videos that were published on her monetized YouTube channel, to which I was a
4 subscriber.

5 4. I am aware that Tati has some ownership connection with, and operates, a
6 company by the name of Halo Beauty Partners, LLC (“Halo”). I am also aware that Halo
7 produces and sells in the State of Washington hair, skin and nails vitamins. Because I was fan of
8 Tati, I purchased vitamins from Halo to try and had them sent to my Washington residence. I
9 personally found Halo’s vitamins to be effective, as they worked very well for me, and in May
10 2019, I was preparing to purchase a subscription to Halo’s vitamins at \$40.00 per month.

11 5. In or about the end of May 2019, I started to watch videos on YouTube on a
12 channel called Without A Crystal Ball, which features a person that goes by the name Katie Joy
13 Paulson.

14 6. In addition to watching Ms. Paulson’s videos on the YouTube channel Without a
15 Crystal Ball, I also followed Ms. Paulson on her various Twitter accounts.

16 7. As a follower of Ms. Paulson’s content on YouTube and other social media
17 platforms that were broadcasted to—and I viewed in—the state of Washington, I personally saw
18 Ms. Paulson’s social media postings and videos regularly attacking Mrs. Westbrook, her husband
19 James Westbrook, and their company Halo. Two videos in particular that stood out to me are
20 named: “Sephora Arrived at My house! And I’ll answer questions too,” and “The Past James &
21 Tati Westbrook Dont want you to Know.”

22 8. Specifically, prior to viewing Ms. Paulson’s content, I thought Tati and James
23 Westbrook were good people trying to do good things in the world, and that they had created a
24 great product through Halo that I was able to afford and was happy to support in the state of
25 Washington. However, my perception of Tati and James Westbrook changed drastically when I
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1 saw that Ms. Paulson claimed in the above-mentioned videos and on her twitter account that she
 2 had done extensive research on James Westbrook and thereafter portrayed him as having
 3 personally taken out reverse mortgages on his mother's house to steal all of her equity in her own
 4 property, and as having removed his mother's oxygen in order to cause her untimely death so
 5 that he could steal her assets. Based upon Ms. Paulson's statements and social media posts on
 6 these topics, I believed Ms. Paulson's statements and representations as to her portrayal of James
 7 Westbrook, and by extension through marriage Tati, to be true. It was Ms. Paulson's specific
 8 claim to have carefully researched and explored public records, and thereafter to have found
 9 James to be a "career criminal" as part of her "story" research that was the final determination
 10 for me to change my feelings regarding the Westbrooks.

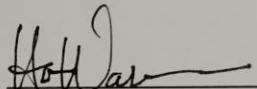
11 9. Ms. Paulson's representations of James Westbrook, and by extension Tati, with
 12 regard to Mr. Westbrook's mother really affected me and caused me to develop negative feelings
 13 toward James Westbrook, Tati, and Halo, which then directly caused me to stop purchasing Halo
 14 vitamins. Specifically, I took care of my mother for many years before she passed away, and I
 15 know how difficult it is to make end-of-life and estate-related decisions. However, the way that
 16 Ms. Paulson described the behavior of Mr. Westbrook, and by extension Tati, was so appalling
 17 that I was completely turned off to Halo and did not want to support a business owned by a
 18 married couple that I was led to believe stole from a parent and caused the untimely death of a
 19 parent for inheritance purposes. As a direct result of Ms. Paulson's representations on this topic
 20 alone, I decided to go elsewhere for my vitamins, I unsubscribed from Tati's monetized
 21 YouTube channel, and I stopped watching Tati Westbrook's monetized videos.

22 10. I also note herein that I am aware of various YouTube controversies that have
 23 occurred involving Tati, including, but not limited to: "Dramageddon," "Karmageddon," and
 24 "Dramageddon 2.0." However, throughout all such controversies, I was never swayed to stop my
 25 support of Halo or Tati's monetized YouTube channel and videos. Rather, it was the specific
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1 allegations and representations that Ms. Paulson made portraying Mr. Westbrook particularly as
2 a career criminal, and also as a person that obtained so many reverse mortgages on his mother's
3 property that he stole all of the equity from her home, and that he caused her untimely death by
4 personally removing his mother's oxygen so that he could steal her assets that exclusively
5 impacted my decision to stop buying products from Halo and to stop watching Tati's monetized
6 content on her monetized channel.

7 I declare under penalty of perjury under the laws of the United States of America that the
8 forgoing is true and correct.

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10 SIGNED at Bothell, Washington, on December 19, 2020.
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Hope Walker